

**SILVER & KELMACHTER, LLP**

ATTORNEYS AT LAW

11 PARK PLACE

SUITE 1503

NEW YORK NY 10007

Leslie D. Kelmachter  
Perry Silver

Aaron Halpern

Frances L. Garfinkel  
Sara C. Ruff  
Tracy Solomon

(212) 661 – 8400  
F (212) 661- 1242

Ariella Colman  
Managing Partner

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**VIA ELECTRONIC FILING/PACER.GOV**

Magistrate Judge Marcia M. Henry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Courtroom 504N  
Brooklyn, New York 11201

Re: Miguel Morel, as Administrator of the Estate of Maria  
Morel v. United States of America, et al.  
Civil Action No: 18-CV-5547

Dear Magistrate Henry:

This firm represents the plaintiff/decedent's estate in the above-referenced matter. I have copied defense counsel on this correspondence and I conferred with her via telephone last week.

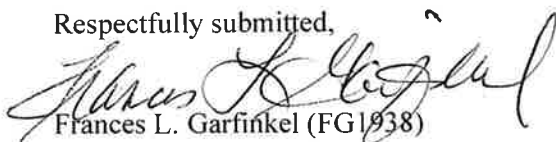
On Monday, July 14, 2025, this firm filed a petition in the Surrogate's Court of Kings County seeking a decree revoking the Limited Letters of Administration issued to Miguel Morel and granting Limited Letters of Administration to his brother Daniel Morel. At present, that petition is under review.

Ms. Balaban and I agreed that voluntary discontinuance is preferable to motion practice. I suggested that the discontinuance be without prejudice, and defense counsel indicated that was acceptable to her. I indicated that I must speak with Daniel Morel regarding the discontinuance, and he and I had a preliminary discussion, however, he has additional questions. I would like to address those questions and my next opportunity to do that is later this afternoon. He undergoes dialysis twice a week, accordingly, I must work around that schedule.

Ms. Balaban and I would like this issue resolved by the end of this month, however Daniel Morel may not be granted Limited Letters of Administration by that time. I do not want to burden the Court or the United States of America with any further judicial proceedings. Accordingly, I am seeking Your Honor's guidance with respect to when the Stipulation of Discontinuance is to be filed, since my actual client has absented himself and his brother has not yet been substituted as estate representative.

Should Your Honor have any questions or require further information, please do not hesitate to contact me.

Respectfully submitted,

  
Frances L. Garfinkel (FG1938)

Cc: Rachael Balaban, Esq., AUSA